

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 4:18CR00213 NAB |
| |) | |
| NEDIC SLAVEN, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3142(d).

As and for its grounds, the Government states as follows:

1. Defendant is charged with a violation of: Title 42, United States Code, Section 1320a-8b, using force against Social Security Administration employees.
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, and the violent nature of defendant's conduct, there is a risk that the defendant poses a danger to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community

and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
UNITED STATES ATTORNEY

/s/ Tracy L. Berry

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